



Notice of Service of Process

SOP / ALL
Transmittal Number: 19379637
Date Processed: 02/18/2019

Primary Contact: Sandra Adams
United Services Automobile Association
9800 Fredericksburg Rd
San Antonio, TX 78288-0002

Electronic copy provided to: Danielle Lopez
Jenna Meurer
Ruby Esquivel
Debra Brake
Carmen Solis

Entity: USAA Insurance Agency, Inc.
Entity ID Number 3692530

Entity Served: USAA Insurance Agency, Inc.

Title of Action: Kayla Bell vs. USAA Insurance Company

Document(s) Type: Citation/Petition

Nature of Action: Contract

Court/Agency: St. Mary Parish District Court, LA

Case/Reference No: 133339 A

Jurisdiction Served: Louisiana

Date Served on CSC: 02/18/2019

Answer or Appearance Due: 15 Days

Originally Served On: CSC

How Served: Personal Service

Sender Information: La-Derical D. Wagner
337-365-4008

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CITATION

KAYLA BELL

STATE OF LOUISIANA

Vs. No. 133339 Div "A"

16th JUDICIAL DISTRICT COURT

USAA INSURANCE COMPANY UM
INSURER

PARISH OF ST. MARY



To: USAA INSURANCE COMPANY, UM INSURER, THROUGH AGENT,
CORPORATION SERVICE COMPANY, 501 LOUISIANA AVENUE, BATON
ROUGE, LA 70802

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation or to file your answer or other pleading to said petition in the office of the Clerk of the 16th Judicial District Court in the St. Mary Parish Court House in the City of Franklin in said Parish within fifteen (15) days after the service hereof. Your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

WITNESS MY HAND AND OFFICIAL SEAL OF OFFICE AT FRANKLIN,
LOUISIANA, JANUARY 31, 2019.

CLERK'S OFFICE, FRANKLIN, LA

CLIFF DRESSEL
Clerk of Court
St. Mary Parish, Louisiana
16th Judicial District Court

JAN 31 2019

A true copy of the original

Attest

Cliff D. Dresel
Dy. Clerk of Court

Jennifer R. Aglame
Deputy Clerk of Court

SPACE BELOW FOR SHERIFF'S RETURN

[SERVICE]

KAYLA BELL

16TH JUDICIAL DISTRICT COURT

VS. NO. 1 3 3 3 3 9 DIV. "A" PARISH OF ST. MARY

USAA INSURANCE COMPANY

STATE OF LOUISIANA

PETITION FOR DAMAGES

The Petition of **KAYLA BELL**, a person of the full age of majority and resident of the parish of St. Mary, State of Louisiana, through undersigned counsel, who would, with respect, represent as follows, to wit:

Made defendant is **USAA INSURANCE COMPANY, UM INSURER**, an entity doing business in this parish. The Underinsured Motorist's insured is also domiciled within St. Mary Parish.

2.

Ms. Bell was involved in a motor vehicle accident operated and owned by defendant Soloman Williams, III on or about January 26, 2017. At all times, **USAA INSURANCE COMPANY** was providing coverage for the insured's vehicle. Go Auto has issued their liability limits in regards to the at fault party. At all times, there was UM coverage on the vehicle driven by Ms. Bell issued by **USAA INSURANCE COMPANY** under Policy Number: 038652845G71019.

3.

Ms. Bell was injured in the motor vehicle accident and has damages in excess of the liability as well as the UM coverage limits. Ms. Bell has suffered severe nerve damage as a result of the accident. It has been recommended and highly suggested that she take Cervical and Lumbar Epidural Steroid Injections. She has been in tremendous pain since the accident and continues to be in pain daily as of this date.

4.

Petitioner prays that she has attempted to settle this case within the policy limits of the defendants to no avail. Due to the UM carrier's failure to properly adjust the claim as outlined in Louisiana R.S. 22:1973 and 22:1892, Petitioner seeks all penalties entitled under the aforementioned statutes as she has submitted satisfactory proof of loss. USAA has not shown

good faith or fair dealing in adjusting this claim by not attempting to fairly compensate and settle this claim in accordance with their policy.

5.

Ms. Bell is currently seeking damages in excess of \$75,000.00.

6.

Petitioner prays that proceedings are heard and that a judgment is entered in favor of plaintiff, **KAYLA BELL**, and against **USAA INSURANCE COMPANY**, in the amount the Court deems reasonable and proper, together with legal interest, from judicial demand, until paid; all penalties under law; plus all costs of these proceedings, and for any further and other legal and equitable relief as the Court deems necessary and proper.

RESPECTFULLY SUBMITTED BY:



LA'DERICAL D. WAGNER (#29470)
Attorney for Plaintiff
111 French Street
New Iberia, LA 70560
Office: (337) 365-4008
Facsimile: (337) 369-9003

PLEASE SERVE:

USAA INSURANCE AGENCY, INC.
Through its registered agent:
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, LA 70802

A FACSIMILE OF THIS PLEADING
WAS RECEIVED AND FILED ON

JAN 24 2019

CLERK'S OFFICE, FRANKLIN, LA

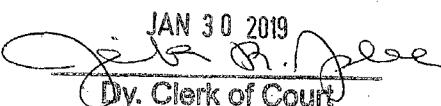
RECEIVED AND FILED

JAN 31 2019

A true copy of the original

Attest: 
Dy. Clerk of Court

JAN 30 2019


Dy. Clerk of Court